

DRAFT

EVALUATION REPORT

Chevron #90535
3675 Geary Blvd.
San Francisco, CA 94118
GDF#11670
Application #16162

BACKGROUND

Chevron #90535 submitted this application to increase the throughput limit at G#11670. The facility is currently equipped with three 12,000 gallon tanks and 30 single product nozzles with Philtite EVR Phase I and balance Phase II vapor recovery controls. On 12/5/06, they were granted an Authority to Construct (A/C) to completely rebuild the site, resulting in a station equipped with 15,000 and 12,000 gallon underground gasoline tanks and 12 triple-product nozzles with Philtite EVR Phase I and Healy EVR Phase II with the ISD system. The station will also have an 8,000 gallon diesel tank with 4 diesel nozzles that is not subject to permit or vapor recovery requirements. This station is currently permitted at its baseline throughput of 2.57 million gallons pursuant to A/N 24320.

A risk screen was performed for this application using the emission factors for the Healy EVR Phase II system. This analysis indicated that an increase of 7.3 million-gallons per year above the baseline throughput is acceptable under the District's Risk Management Policy and complies with District Regulation 2 Rule 5 Section 302.

Accordingly, this facility will be issued an superceding A/C authorizing the work approved under A/N 15343 and incorporating a 9.87 million gallons per year throughput limit (2.57 Mmgal baseline + 7.3 Mmgal increase). This throughput limit (condition #23595) will become effective upon the issuance of the final Permit to Operate for the re-built station.

This station is within 1,000 feet of Roosevelt Middle School, triggering the Public Notice requirements of the Waters Bill. There are no other schools within ¼ mile of this station.

Before the throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above school and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

EMISSION CALCULATIONS

Emission factors are taken from Scott Owen's July 7, 2006 memorandum. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 7.3 million gallons per year is based on the results of the Air Toxics Risk Screening.

Emissions increase:

(7.3 million gal/yr)(0.75 lb/1000 gal)	= 5475 lb/yr
	= 15 lb/day
	= 2.74 TPY

Benzene emissions increase: (7.3 million gal/yr) (4.49 lbs Benzene/million gallons)

= 32.78 lb/yr
= 0.090 lb/day
= 0.016 TPY

NEW SOURCE REVIEW

This station will emit more than 10# of VOC in a single day. Thus the BACT requirement of Regulation 2-2-301 is triggered.

BACT for GDFs is considered the use of CARB-certified EVR Phase-I and EVR Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified. This facility will comply with this requirement.

Emissions from this station will remain less than 10 tpy. Per Regulation 2-2-302, offsets are not required.

TBACT

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment per Regulation 2-5-301. TBACT for GDFs is considered the use of CARB-certified EVR Phase-I and EVR Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

COMPLIANCE

A. Permits – General Requirements, Regulation 2, Rule 1

1. **California Environmental Quality ACT (CEQA), Regulation 2-1-311:** This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3. and therefore is not discretionary as defined by CEQA.
2. **Public Notice, Schools, Regulation 2-1-412:** The facility is located within 1000 feet of the outer boundary of Roosevelt Middle School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned school and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

B. Permits – New Source Review, Regulation 2, Rule 2

1. **Best Available Control Technology (BACT), Regulation 2-2-301:** BACT is triggered because the facility will emit more than 10 lbs of VOC per single day.
2. **Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 10 tons per year, the facility is not required to provide offsets.

C. Permits – New Source Review of Toxic Air Contaminants, Regulation 2, Rule 5

1. **Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301:** TBACT is triggered since the increased cancer risk from this project exceeds 1 per million. The facility complies with TBACT for GDFs.
2. **Project Risk Requirement, Regulation 2-5-302:** The increased cancer risk does not exceed 10 in one million, the chronic and acute hazard indexes do not exceed 1, and therefore the project complies with the project risk requirement.

D. **Fees – Regulation 3**

All applicable fees have been paid.

E. **Gasoline Dispensing Facilities, Regulation 8, Rule 7**

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-101, VR-202, and G-70-52AM.

RECOMMENDATION

I recommend that a superceding A/C be issued to Chevron Station #90535 incorporating the equipment modifications originally approved under A/N 15343 and reflecting the above throughput increase.

By: _____
Scott Owen
Supervising Air Quality Engineer

Date: 06/14/07